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July 3, 2018

VIA ECF

The Honorable Roanne L. Mann
Chief United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Raymond Tavares, et al. v. City of New
York, et al., 17 CV 5221 (KAM)(RLM)**

Your Honor:

I represent plaintiffs in the above-referenced action and write to respectfully request that the Court modify its June 25, 2018 discovery order to allow plaintiffs to (i) obtain defendants' personnel records and the District Attorney's file, and (ii) conduct defendants' depositions. This is the first such request by plaintiff. The defendants do not consent, notwithstanding plaintiff's consent to defendants' prior motion to extend discovery that resulted in the June 25 order.

When plaintiffs consented to the defendants' prior request, the undersigned intended to use the extension to depose defendants and finish documentary discovery. Granting plaintiffs' request to depose defendants, or complete the above paper discovery, will not result in any harm or prejudice to the defendants nor will it unduly delay the action. Accordingly, plaintiffs ask that the Court modify its prior order to permit plaintiffs to take the delineated discovery, without which they surely will be prejudiced going forward.

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I thank the Court for its kind consideration.

Respectfully submitted, ,



Amy Rameau

cc: All counsel of record (by ECF)

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